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L.C., I.H., A.L., and Antonia Salas Ubaldo

**UNITED STATES DISTRICT COURT FOR THE  
CENTRAL DISTRICT OF CALIFORNIA**

L.C., a minor by and through her guardian *ad litem* Maria Cadena, individually and as successor-in-interest to Hector Puga; I.H., a minor by and through his guardian *ad litem* Jasmine Hernandez, individually and as successor-in-interest to Hector Puga; A.L., a minor by and through her guardian *ad litem* Lydia Lopez, individually and as successor-in-interest to Hector Puga; and ANTONIA SALAS UBALDO, individually;

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY OF SAN BERNARDINO; S.S.C., a nominal defendant; ISIAIAH KEE; MICHAEL BLACKWOOD; BERNARDO RUBALCAVA; ROBERT VACCARI; JAKE ADAMS; and DOES 6-10, inclusive,

Defendants.

Case No. 5:22-cv-00949-KK-SHK

*Honorable Kenly Kiya Kato*

**APPLICATION FOR LEAVE TO  
FILE UNDER SEAL EXHIBITS IN  
OPPOSITION TO DEFENDANTS'  
MOTIONS FOR SUMMARY  
JUDGMENT [LOCAL RULE 79-  
5.2.2(b)]**

**TO THE HONORABLE COURT AND TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that L.C., I.H., A.L., and Antonia Salas Ubaldo hereby submits this application to file under seal the following documents and things:

- **“Exhibit 6”** – a true and correct copy of the relevant portions of the transcribed March 3, 2021 interview of Robert Vaccari.
- **“Exhibit 9”** – a true and correct copy of a cellphone video of the incident taken by witness Edward Mangerino, produced by County Defendants in the course of discovery, bates stamped COSB001459.
- **“Exhibit 20”** – a true and correct copy of the relevant portions of the transcribed February 22, 2021 Interview of Isaiah Kee.

See Declaration of Hang D. Le (“Le Decl.”) ¶ 2.

These documents have been designated by Defendants County of San Bernardino as confidential pursuant to the protective order entered by then-Magistrate Kenly Kiya Kato on September 19, 2023 (Doc. No. 74).

DATED: February 27, 2025

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Bv /s/ Hang D. Le

Dale K. Galipo  
Hang D. Le  
Attorneys for Plaintiffs